REMARKS/ARGUMENTS

Claims 1-28 are pending in the application. Claims 1-28 are rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. Claim 9 is rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 1, 2, 3, 4, 5, 6, 11, 12, 13, 14, 15, 16, 17, 18, 19, 24, 25, 26, 27, 28 are rejected under 35 U.S.C. §102(b) as being anticipated by Unger et al. (US 5,991,713, Nov. 23, 1999). Claims 7, 20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Unger, in view of Povilus (US 5,740,425, issued April 1998). Claims 8, 21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Unger in view of Chanod et al (U.S. Patent No. 6,393,389). Claims 9, 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Unger in view of Anderson (U.S. Patent No. 6,021,202). Claims 10, 23 are rejected under 35 U.S.C. 103(a) as being unpatentable over Unger in view of Burrows et al (U.S. Patent No. 5,963,954). With respect to the 35 U.S.C. 112 second paragraph rejection, examples of "standard escape notation" sufficient to overcome the rejection may be found at page 5, line 6 and page 8, line 17 of the specification.

As for the 35 U.S.C. §101 rejection, Applicants submit that claims 1-28 are method and apparatus claims wherein the elements "computing device", "encoder", "memory device", and "server" provide more than sufficient structure required under §101 (*see* at least MPEP §2106 (IV)B(1)a *and* §2106(IV)B(2)b). Accordingly, reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. §101 is respectfully requested.

Applicants respectfully submit that the cited reference does not teach, suggest or disclose "[a] method for content based HyperText Markup Language (HTML) coding comprising: accessing source HTML data; *simplifying* the HTML data, the simplifying *minimizing the size of*

the HTML data, knowledge of the HTML data being used during the simplification; encoding the simplified HTML data; and storing the encoded HTML data" (e.g., as disclosed in the embodiment of claim 1).

The Office Action states that Unger teaches simplifying...during the simplification in that Unger discloses a compiler that compresses and further cites col. 8 lines 35-53 and col. 8 line 55.

First, Applicants disagree with the Office Action's implication that simplification by minimizing the size of the HTML data merely entails compression. Compression does not *simplify* the data, but rather attempts to preserve data as exactly as possible in a compressed form. Simplification, on the other hand, implies actual alteration of the data *itself.* Such simplification may be accomplished, for example, by minimization of the actual data (i.e., elimination of unnecessary or redundant data elements). The Unger reference does not disclose any such *simplification* in its disclosure.

For example, col.8 lines 35-53 state:

> In step 202 the compiler retrieves each file. The retrieval process includes fetching each object identified to the compiler, and in addition, fetching required objects that are referenced by tags within those files. These referenced files will frequently be either other hypertext files or object files representing a stored picture, video, or sound.
>
> In step 204, the compiler parses the hypertext file in order to separate the tags from the corresponding text and objects. A correspondence table is created to preserve the relationship between the tags and the corresponding text and objects.
>
> In steps 206 through 214 the compiler compresses the text contained within the files and stores the compressed text in accordance with a preferred method of compression and storage detailed below. Although the compression method set forth below is preferred, for purposes of compressing the compiled file, compression may be performed with any suitable technique including: Huffman, Lempel-Ziv or simple run-length encoding.

Compression as defined in Unger is defined in the third paragraph of the cited section. In this section there is no mention of the minimization of the *actual* HTML data, but rather a global compression of the unaltered data achieved through multiple data. The compression does not entail simplification.

Moreover, in step 204, Unger discloses the ability of the compiler to separate tags from the corresponding texts and objects. Again, this does not disclose the minimization of the actual data *itself*, but merely the associated tags necessary to format and facilitate the HTML code. The separation of the tags does not simplify the data itself, as described in the embodiment of independent claim 1. Also, the section beginning at col. 3 line 55 ("Compression and Storage Methods") does not contain any teaching, suggestion or disclosure of such a simplification process either.

For support, Applicants cite line page 5 lines 3-19 and Fig. 3 (including associated description at page 8 line 9) of the specification. In these section, Applicants disclose various embodiments of simplification, including representing infrequent characters with the Universal Resource Locator (URL) escaped notation, removal of comments and blank spaces, and simplifying multiple characters (using multiple bytes) into a single byte.

Povilus fails to make up for the deficiencies of Unger. Povilius discloses a "pre-compile" process that entails normalizing SKU tables and schemes to compress data. Provilius also discloses the removal of data as part of a "capture" process. Examples of the type of capture process data removed include realm column information and binder page reference numbers. However, Provilus does not disclose the simplification of the actual data *itself*.

Similarly, Burrows fails to make up for the deficiencies of Unger. The cited sections of Burrows are not directed to simplification, but rather towards determining and maintaining

locations of words in a given data set, wherein a sequence of pairs are used to denote the locations of the words (lines 44-46, "The parsing module produces a sequence of pairs 500 in a collating order according to the locations of the words 300 of the various pages 200"). The cited section of Burrows is inapplicable as it is not directed towards simplification during content based HTML coding.

Chanod also fails to make up for the deficiencies of Unger. Although Chanod does discloses the manipulation of tokens and the removal of HTML tags, it is directed towards translation between two languages, and not simplification or compression. Moreover, Chanod does not disclose *simplification* of the data itself as found in embodiments of the present invention.

Lastly, Anderson fails to make up for the deficiencies of Unger as well. The cited section of Anderson states:

> The FSML documents are ASCII documents that are both human readable and machine readable and processable. ASCII encoding of data items provides integer, hex, real, string and boolean types. Tags and values are readable without special software. SGML escape sequences permit internationalization. ASCII formats are compatible with electronic mail transaction as well as with V.42bis and other data compression.

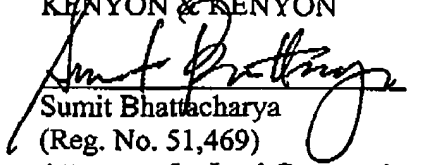
Contrary to the Office Action's assertion, the use of standard escape notation is not found anywhere in the Anderson reference.

Therefore, since each and every limitation of independent claim 1 is not found in the cited reference, the 35 U.S.C. §102(b) rejection should be withdrawn and claim 1 should be allowed. Independent claims 13 and 17 contain similar allowable limitations, and therefore should be allowed as well. Claims 2-12, 14-16, and 18-28 depend from allowable base claims and therefore are allowable as well.

For at least all the above reasons, the Applicant respectfully submits that this application is in condition for allowance. A Notice of Allowance is earnestly solicited.

The Examiner is invited to contact the undersigned at (408) 975-7500 to discuss any matter concerning this application. The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. § 1.16 or § 1.17 to Deposit Account No. **11-0600**.

Respectfully submitted,
KENYON & KENYON

Dated: September 1, 2005 By: 

Sumit Bhattacharya
(Reg. No. 51,469)
Attorneys for Intel Corporation

KENYON & KENYON
333 W. San Carlos St., Suite 600
San Jose, CA 95110
Telephone: (408) 975-7500
Facsimile: (408) 975-7501

Customer No. 25693